REMARKS

This is a full and timely response to the outstanding final Office Action mailed July 28, 2005. Upon entry of the amendments in this response, claims 1, 42 – 64, and 79 – 81 remain pending. In particular, Applicants cancel claims 65 – 78 without prejudice, waiver, or disclaimer. Applicants cancel claims 65 – 78 merely to reduce the number of disputed issues and to facilitate early allowance and issuance of other claims in the present application. Applicants reserve the right to pursue the subject matter of these canceled claims in a continuing application, if Applicants so choose, and do not intend to dedicate the canceled subject matter to the public. Reconsideration and allowance of the application and presently pending claims are respectfully requested.

I. Rejections Under 35 U.S.C. §102

A proper rejection of a claim under 35 U.S.C. §102 requires that a single cited art reference disclose each element of the claim. *See, e.g., W.L. Gore & Assoc., Inc. v. Garlock, Inc.,* 721 F.2d 1540, 220 USPQ 303, 313 (Fed. Cir. 1983).

A. Claim 1 is Patentable Over *Lasky*

The Office Action indicates that claim 1 stands rejected under 35 U.S.C. §102(e) as allegedly being anticipated by U.S. Patent Number 6,367,078 ("*Lasky*"). Applicants respectfully traverse this rejection on the grounds that *Lasky* does not disclose, teach, or suggest all of the claimed elements. Claim 1 recites:

> In a television network, a terminal for displaying television program information and television programs, said terminal comprising:

an interface to the television network, said interface being capable of receiving a first data, said first data including respective program information for a plurality of corresponding television programs;

a memory configured for storing the first data and a second data, said second data different than the first data, said *second data comprising a plurality of assigned categories to television channels*; and

a processor, coupled to the memory, for causing the display of program information corresponding to a first portion of the first data, said first portion of the first data corresponding to at least one television channel being determined by a corresponding assigned category in the second data.

Applicants submit that *Lasky* fails to disclose, teach, or suggest at least "a terminal for displaying television program information and television programs, said terminal comprising... a memory configured for storing the first data and a second data, said second data different than the first data, said *second data comprising a plurality of assigned categories to television channels*" as recited in claim 1. The Office Action asserts that *Lasky* discloses a "memory configured for storing the first data and a second data... the second data different than the first data, the second data comprising a plurality of assigned categories to television channels" (OA beginning p. 2 third line from bottom).

Applicants respectfully disagree with this analysis. As indicated in the excerpts cited by the Office Action, *Lasky* discloses that a "channel hat 62... comprises at least an indication of the channel number 132 just selected and of the existence of other channels carrying programs in the same category as the program on the selected channel" (col. 6, line 31). Additionally, *Lasky* discloses "FIG. 6B also shows the title 623 and category 624 of the program on the newly selected channel... The hat-data module retrieves the channel number 132, title 623, and category 624 of the program on the newly selected channel..." (col. 6, beginning line 50). Further, as illustrated in FIG. 6B, item 621 denotes "indication of program(s) in category of

program on selected channel at lower numbered channels... Similarly, item 622 denotes

"indication of program(s) in category of program on selected channel at higher numbered

channels..." as shown in FIG. 6B.

As clearly illustrated in the above-cited passages, *Lasky* appears to suggest that *programs are assigned to categories*. Applicants submit that this is vastly different than "a terminal for displaying television program information and television programs, said terminal comprising... a memory configured for storing the first data and a second data, said second data different than the first data, said *second data comprising a plurality of assigned categories to television channels*" as recited in claim 1. For at least this reason claim 1 is patentable over *Lasky*.

B.   Claim 53 is Patentable Over *Lasky*

The Office Action indicates that claim 53 stands rejected under 35 U.S.C. §102(e) as

allegedly being anticipated by U.S. Patent Number 6,367,078 ("*Lasky*"). Applicants respectfully

traverse this rejection on the grounds that *Lasky* does not disclose, teach, or suggest all of the

claimed elements. Claim 53 recites:

> In a television network, a terminal for displaying television program information and television programs, said terminal comprising:
> an interface to the television network, said interface being capable of receiving a first data and a second data, said first data including respective program information for a plurality of corresponding television programs, *said second data comprising respective television channel identification for a plurality of television channels and respective associations of one or more categories to each television channel identification*;
> a memory configured for storing the first data and the second data; and
> a processor, coupled to the memory, for causing the display of program information in the first data, said program information corresponding to television programs being provided by at least a portion of the plurality of television channels said at least portion of the plurality of

television channels being determined by a corresponding association to a first category in the second data.

Applicants submit that *Lasky* fails to disclose, teach, or suggest at least "a terminal for displaying television program information and television programs, said terminal comprising an interface to the television network, said interface being capable of receiving a first data and a second data, said first data including respective program information for a plurality of corresponding television programs, ***said second data comprising respective television channel identification for a plurality of television channels and respective associations of one or more categories to each television channel identification...***" as recited in claim 53. The Office Action asserts that *Lasky* discloses "second data comprising respective television channel identification for a plurality of television channels and respective associations of one or more categories to each television channel identification" (OA beginning p. 6, line 3).

Applicants respectfully disagree with this analysis. As indicated in the excerpts cited by the Office Action, *Lasky* discloses that a "channel hat 62... comprises at least an indication of the channel number 132 just selected and of the existence of other channels carrying programs in the same category as the program on the selected channel" (col. 6, line 31). Additionally, *Lasky* discloses "FIG. 6B also shows the title 623 and category 624 of the program on the newly selected channel... The hat-data module retrieves the channel number 132, title 623, and category 624 of the program on the newly selected channel..." (col. 6, beginning line 50). Further, as illustrated in FIG. 6B, item 621 denotes "indication of program(s) in category of program on selected channel at lower numbered channels... Similarly, item 622 denotes "indication of program(s) in category of program on selected channel at higher numbered channels..." as shown in FIG. 6B.

As clearly illustrated in the above-cited passages, *Lasky* appears to suggest that *programs are assigned to categories*. Applicants submit that this is vastly different than "a terminal for displaying television program information and television programs, said terminal comprising an interface to the television network, said interface being capable of receiving a first data and a second data, said first data including respective program information for a plurality of corresponding television programs, said second data comprising respective television channel identification for a plurality of television channels and *respective associations of one or more categories to each television channel identification...*" as recited in claim 53. For at least this reason claim 53 is patentable over *Lasky*.

C.   Claim 55 is Patentable Over *Lasky*

The Office Action indicates that claim 55 stands rejected under 35 U.S.C. §102(e) as allegedly being anticipated by U.S. Patent Number 6,367,078 ("*Lasky*"). Applicants respectfully traverse this rejection on the grounds that *Lasky* does not disclose, teach, or suggest all of the claimed elements. Claim 55 recites:

> In a television network, a terminal for displaying television program information and television programs, said terminal comprising:
> a memory configured for storing respective program information for a plurality of corresponding television programs and *respective associations of one or more categories for a plurality of corresponding television channels*; and
> a processor, coupled to the memory, for causing the display of a browse banner on top of a portion of a first television program being displayed responsive to receiving an initial activation of a browse command, said browse banner comprising a first program information in the first data, said first program information corresponding to a second television program different than the first television program, wherein the processor causes the display of browse banner on top of the first television program without providing the second television program.

Applicants submit that *Lasky* fails to disclose, teach, or suggest at least "a terminal for displaying television program information and television programs, said terminal comprising a memory configured for storing respective program information for a plurality of corresponding television programs and *respective associations of one or more categories for a plurality of corresponding television channels*..." as recited in claim 55. The Office Action asserts that *Lasky* discloses "a terminal comprising a memory configured for storing respective program information for a plurality of corresponding television programs and respective associations of one or more categories for a plurality of corresponding television channels" (OA beginning p. 6, line 16).

Applicants respectfully disagree with this analysis. As indicated in the excerpts cited by the Office Action, *Lasky* discloses that a "channel hat 62... comprises at least an indication of the channel number 132 just selected and of the existence of other channels carrying programs in the same category as the program on the selected channel" (col. 6, line 31). Additionally, *Lasky* discloses "FIG. 6B also shows the title 623 and category 624 of the program on the newly selected channel... The hat-data module retrieves the channel number 132, title 623, and category 624 of the program on the newly selected channel..." (col. 6, beginning line 50). Further, as illustrated in FIG. 6B, item 621 denotes "indication of program(s) in category of program on selected channel at lower numbered channels... Similarly, item 622 denotes "indication of program(s) in category of program on selected channel at higher numbered channels..."

As clearly illustrated in the above-cited passages, *Lasky* appears to suggest that *programs are assigned to categories*. Applicants submit that this is vastly different than "a terminal for

displaying television program information and television programs, said terminal comprising a memory configured for storing respective program information for a plurality of corresponding television programs and *respective associations of one or more categories for a plurality of corresponding television channels...*" as recited in claim 55. For at least this reason claim 55 is patentable over *Lasky*.

D. Claim 57 is Patentable Over *Lasky*

The Office Action indicates that claim 57 stands rejected under 35 U.S.C. §102(e) as allegedly being anticipated by U.S. Patent Number 6,367,078 ("*Lasky*"). Applicants respectfully traverse this rejection on the grounds that *Lasky* does not disclose, teach, or suggest all of the claimed elements. Claim 57 recites:

> In a television network, a terminal for displaying television program information and television programs, said terminal comprising:
> a memory configured for storing respective program information for a plurality of corresponding television programs and a plurality of television channel categories, *each television channel category being associated with a corresponding plurality of television channels*; and
> a processor coupled to the memory, said processor configured to:
> receive a user-selected television channel category, and
> responsive to the receiving the user-selected television channel category, provide program information exclusively for television programs corresponding to television channels associated with the user-selected television channel category.

Applicants submit that *Lasky* fails to disclose, teach, or suggest at least "a terminal for displaying television program information and television programs, said terminal comprising a memory configured for storing respective program information for a plurality of corresponding television programs and a plurality of television channel categories, *each television channel*

category being associated with a corresponding plurality of television channels..." as recited

in claim 57. The Office Action asserts that *Lasky* discloses "a terminal comprising a memory

configured for storing respective program information for a plurality of corresponding television

programs and respective associations of one or more categories for a plurality of corresponding

television channels" (OA beginning p. 6, line 16).

Applicants respectfully disagree with this analysis. As indicated in the excerpts cited by

the Office Action, *Lasky* discloses that a "channel hat 62... comprises at least an indication of the

channel number 132 just selected and of the existence of other channels carrying programs in the

same category as the program on the selected channel" (col. 6, line 31). Additionally, *Lasky*

discloses "FIG. 6B also shows the title 623 and category 624 of the program on the newly

selected channel... The hat-data module retrieves the channel number 132, title 623, and

category 624 of the program on the newly selected channel..." (col. 6, beginning line 50).

Further, as illustrated in FIG. 6B, item 621 denotes "indication of program(s) in category of

program on selected channel at lower numbered channels... Similarly, item 622 denotes

"indication of program(s) in category of program on selected channel at higher numbered

channels..."

As clearly illustrated in the above-cited passages, *Lasky* appears to suggest that *programs*

are assigned to categories. Applicants submit that this is vastly different than "a terminal for

displaying television program information and television programs, said terminal comprising a

memory configured for storing respective program information for a plurality of corresponding

television programs and a plurality of television channel categories, *each television channel*

category being associated with a corresponding plurality of television channels..." as recited

in claim 57. For at least this reason claim 57 is patentable over *Lasky*.

E. Claim 79 is Patentable Over _Lasky_

The Office Action indicates that claim 79 stands rejected under 35 U.S.C. §102(e) as allegedly being anticipated by U.S. Patent Number 6,367,078 ("_Lasky_"). Applicants respectfully traverse this rejection on the grounds that _Lasky_ does not disclose, teach, or suggest all of the claimed elements. Claim 79 recites:

> In a television network, a terminal for displaying television program information and television programs, said terminal comprising:
> a memory configured for storing respective program information for a plurality of corresponding television programs and _a plurality of television channel categories, each television channel category being associated with a corresponding plurality of television channels_; and
> a processor, coupled to the memory, said processor configured to:
> cause display of program information exclusively for television programs corresponding to television channels associated with at least one user-selected television channel category, and
> cause display of television programs corresponding exclusively to the at least one user-selected television channel category.

Applicants submit that _Lasky_ fails to disclose, teach, or suggest at least "a terminal for displaying television program information and television programs, said terminal comprising a memory configured for storing respective program information for a plurality of corresponding television programs and _a plurality of television channel categories, each television channel category being associated with a corresponding plurality of television channels_..." as recited in claim 79. The Office Action asserts that "_Lasky_ shows that the processor causes the display of corresponding programs exclusively to the at least one user selected television channel category... All other limitations have been discussed with regard to claim 75" (OA beginning p. 9, second paragraph).

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Applicants respectfully disagree with this analysis. As indicated in the excerpts

previously cited by the Office Action, *Lasky* discloses that a "channel hat 62... comprises at least

an indication of the channel number 132 just selected and of the existence of other channels

carrying programs in the same category as the program on the selected channel" (col. 6, line 31).

Additionally, *Lasky* discloses "FIG. 6B also shows the title 623 and category 624 of the program

on the newly selected channel... The hat-data module retrieves the channel number 132, title

623, and category 624 of the program on the newly selected channel..." (col. 6, beginning line

50). Further, as illustrated in FIG. 6B, item 621 denotes "indication of program(s) in category of

program on selected channel at lower numbered channels... Similarly, item 622 denotes

"indication of program(s) in category of program on selected channel at higher numbered

channels..."

As clearly illustrated in the above-cited passages, *Lasky* appears to suggest that *programs*

are assigned to categories. Applicants submit that this is vastly different than "a terminal for

displaying television program information and television programs, said terminal comprising a

memory configured for storing respective program information for a plurality of corresponding

television programs and *a plurality of television channel categories, each television channel*

category being associated with a corresponding plurality of television channels..." as recited

in claim 79. For at least this reason claim 79 is patentable over *Lasky*.

F.   Claim 81 is Patentable Over *Lasky*

The Office Action indicates that claim 81 stands rejected under 35 U.S.C. §102(e) as

allegedly being anticipated by U.S. Patent Number 6,367,078 ("*Lasky*"). Applicants respectfully

traverse this rejection on the grounds that *Lasky* does not disclose, teach, or suggest all of the claimed elements. Claim 81 recites:

> In a television network, a terminal for displaying television program information and television programs, said terminal comprising:
>> a memory configured for storing respective program information for a plurality of corresponding television programs and a plurality of categories affecting the display of program information; and
>> a processor, coupled to the memory, said processor configured to:
>>> cause display of program information corresponding to television programs *according to a television channel category and a television program category, said television channel category being in association with at least one corresponding television channel*, said television program category being in association with the corresponding program information of at least one television program.

Applicants submit that *Lasky* fails to disclose, teach, or suggest at least "a terminal for displaying television program information and television programs, said terminal comprising a processor, coupled to the memory, said processor configured to: cause display of program information corresponding to television programs *according to a television channel category and a television program category, said television channel category being in association with at least one corresponding television channel*, said television program category being in association with the corresponding program information of at least one television program" as recited in claim 81. The Office Action asserts that "*Lasky* shows that the processor causes the display of corresponding programs exclusively to the at least one user selected television channel category... All other limitations have been discussed with regard to claim 75" (OA beginning p. 9, second paragraph).

Applicants respectfully disagree with this analysis. As indicated in the excerpts previously cited by the Office Action, *Lasky* discloses that a "channel hat 62... comprises at least an indication of the channel number 132 just selected and of the existence of other channels

carrying programs in the same category as the program on the selected channel" (col. 6, line 31).

Additionally, *Lasky* discloses "FIG. 6B also shows the title 623 and category 624 of the program on the newly selected channel... The hat-data module retrieves the channel number 132, title 623, and category 624 of the program on the newly selected channel..." (col. 6, beginning line 50). Further, as illustrated in FIG. 6B, item 621 denotes "indication of program(s) in category of program on selected channel at lower numbered channels... Similarly, item 622 denotes "indication of program(s) in category of program on selected channel at higher numbered channels..."

As clearly illustrated in the above-cited passages, *Lasky* appears to suggest that ***programs are assigned to categories***. Applicants submit that this is vastly different than "a terminal for displaying television program information and television programs, said terminal a processor, coupled to the memory, said processor configured to: cause display of program information corresponding to television programs *according to a television channel category and a television program category, said television channel category being in association with at least one corresponding television channel*, said television program category being in association with the corresponding program information of at least one television program" as recited in claim 81. For at least this reason claim 81 is patentable over *Lasky*.

G.   Claims 42 – 52 are is Patentable Over *Lasky*

In addition, dependent claims 42 – 52 are believed to be allowable for at least the reason that these claims depend from allowable independent claim 1. *In re Fine, Minnesota Mining and Mfg.Co. v. Chemque, Inc.*, 303 F.3d 1294, 1299 (Fed. Cir. 2002).

II. Rejections Under 35 U.S.C. §103

In order for a claim to be properly rejected under 35 U.S.C. §103, the teachings of the cited art reference must suggest all features of the claimed invention to one of ordinary skill in the art. *See, e.g., In re Dow Chemical*, 837 F.2d 469, 5 U.S.P.Q.2d 1529, 1531 (Fed. Cir. 1988); *In re Keller*, 642 F.2d 413, 208 U.S.P.Q. 871, 881 (C.C.P.A. 1981). Further, "[t]he PTO has the burden under section 103 to establish a prima facie case of obviousness. It can satisfy this burden only by showing some objective teaching in the prior art or that knowledge generally available to one of ordinary skill in the art would lead that individual to combine the relevant teachings of the references." *In re Fine, Minnesota Mining and Mfg.Co. v. Chemque, Inc.*, 303 F.3d 1294, 1299 (Fed. Cir. 2002).

A. Claim 51 is Patentable Over *Lasky* in View of *Amano*

The Office Action indicates that claim 51 stands rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over *Lasky* in view of U.S. Patent Number 5,585,865 ("*Amano*"). Applicants respectfully traverse this rejection for at least the reason that *Lasky* in view of *Amano* fails to disclose, teach, or suggest all of the elements of claim 51. More specifically, claim 51 is believed to be allowable for at least the reason that claim 51 depends from allowable claim 1. *In re Fine, Minnesota Mining and Mfg.Co. v. Chemque, Inc.*, 303 F.3d 1294, 1299 (Fed. Cir. 2002).

B.   Claims 54, 56, 58 – 64, 73, 74, and 80 are Patentable Over _Lasky_ in View of _Yuen_

1.   Claim 59 is Patentable Over _Lasky_ in View of _Yuen_

The Office Action indicates that claim 59 stands rejected under 35 U.S.C. 103(a) as

allegedly being unpatentable over _Lasky_ as further in view of U.S. patent number 5,673,089

("_Yuen_"). Applicants respectfully traverse this rejection for at least the reason that _Lasky_ in view

of _Yuen_ fails to disclose, teach, or suggest all of the elements of claim 59. Claim 59 recites:

> In a television network, a terminal for displaying television program
> information and television programs, said terminal comprising:
> an interface for receiving data from to the television network, said
> interface being capable of receiving a first data and a second data, said first
> data including respective program information for a plurality of
> corresponding television programs, said second data comprising a
> plurality of categories, each category being associated with a
> corresponding plurality of television channels, said plurality of categories
> including a first category;
> a memory configured for storing the first and the second data; and
> a processor, coupled to the memory, said processor configured to:
> receive a first user input _corresponding to the assignment_
> _of the first category to a first television channel,_
> responsive to the receiving the first user input, store the
> association of the first category and the first television channel in the
> memory,
> receive a second user input corresponding to the first
> category, and
> responsive to the receiving the second user input, cause
> the display of program information for television programs corresponding
> to television channels associated with the first category, wherein the
> association of the first category to at least one television channel is
> received by the terminal from the television network .

Applicants submit that _Lasky_ in view of _Yuen_ fails to disclose, teach, or suggest at least

"a terminal for displaying television program information and television programs, said terminal

comprising... a processor, coupled to the memory, said processor configured to: receive a first

user input *corresponding to the assignment of the first category to a first television channel...*" as recited in claim 59. More specifically, the Office Action asserts that *Yuen* discloses "receiving a user input corresponding to the assignment of the first category to a first television channel..."

Applicants respectfully disagree with this analysis. As illustrated in *Yuen*, column 5, beginning line 13, *Yuen* discloses that "[t]he first step in using the theme keys is to store selected channels under each theme key. These channels are stored in theme memory." As illustrated in this excerpt, *Yuen* appears to suggest that a *channel is assigned to a category*. Applicants submit that this is vastly different than receiv[ing] a first user input corresponding to the assignment of the *first category to a first television channel*. For at least this reason, Applicants submit that claim 59 is allowable over *Lasky* in view of *Yuen*.

2.   Claim 61 is Patentable Over *Lasky* in View of *Yuen*

The Office Action indicates that claim 61 stands rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over *Lasky* as further in view of U.S. patent number 5,673,089 ("*Yuen*"). Applicants respectfully traverse this rejection for at least the reason that *Lasky* in view of *Yuen* fails to disclose, teach, or suggest all of the elements of claim 61. Claim 61 recites:

> In a television network, a terminal for displaying television program information and television programs, said terminal comprising:
> an interface for receiving data from to the television network, said interface being capable of receiving a first data and a second data, said first data including respective program information for a plurality of corresponding television programs, said second data comprising respective *associations of one or more categories for a plurality of corresponding television channels*, said second data including a first association of a first category to a first television channel;
> a memory including a first portion configured for storing the first data and a second portion configured for storing the second data; and

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a processor, coupled to the memory, said processor configured to:

receive a first user input corresponding to a modification of the first association;

responsive to the first user input, cause a modified second data by storing the modified first association in the second portion of the memory;

cause replacing the modified second data in the second portion of the memory with a fourth data, said fourth data comprising a third data set and the modified first association, said third data being received from the television network, said third data corresponding to an updated version of the second data, said third data including the first association, and

cause display of program information for television programs corresponding to television channels according to the associations of categories to television channels stored in the second portion of the memory.

Applicants submit that *Lasky* in view of *Yuen* fails to disclose, teach, or suggest at least "a terminal for displaying television program information and television programs, said terminal comprising an interface for receiving data from to the television network, said interface being capable of receiving a first data and a second data, said first data including respective program information for a plurality of corresponding television programs, said second data comprising respective *associations of one or more categories for a plurality of corresponding television channels*, said second data including a first association of a first category to a first television channel..." as recited in claim 61. More specifically, the Office Action asserts that *Yuen* discloses "receiving a user input corresponding to the assignment of the first category to a first television channel..." (p. 16, line 8).

Applicants respectfully disagree with this analysis. As illustrated in *Yuen*, column 5, beginning line 13, *Yuen* discloses that "[t]he first step in using the theme keys is to store selected channels under each theme key. These channels are stored in theme memory." As illustrated in this excerpt, *Yuen* appears to suggest that a *channel is assigned to a category*.

Applicants submit that this is vastly different than "respective *associations of one or more*

categories for a plurality of corresponding television channels," as recited in claim 61. For at

least this reason, Applicants submit that claim 61 is allowable over *Lasky* in view of *Yuen*.

3. Claim 63 is Patentable Over *Lasky* in View of *Yuen*

The Office Action indicates that claim 63 stands rejected under 35 U.S.C. 103(a) as

allegedly being unpatentable over *Lasky* as further in view of U.S. patent number 5,673,089

("*Yuen*"). Applicants respectfully traverse this rejection for at least the reason that *Lasky* in view

of *Yuen* fails to disclose, teach, or suggest all of the elements of claim 63. Claim 63 recites:

> In a television network, a terminal for displaying television program
> information and television programs, said terminal comprising:
> an interface for receiving data from to the television network, said
> interface being capable of receiving a first data and a second data, said first
> data including respective program information for a plurality of
> corresponding television programs, said second data comprising
> respective *associations of one or more categories for a plurality of*
> *corresponding television channels*, said second data including a first
> association of a first category to a first television channel;
> a memory including a first portion configured for storing the first
> data and a second portion configured for storing the second data; and
> a processor, coupled to the memory, said processor configured to:
> receive a first user input corresponding to a modification
> of the first association;
> responsive to the first user input, cause a modified second
> data by storing the modified first association in the second portion of the
> memory;
> cause replacing the modified second data in the second
> portion of the memory with a fourth data, said fourth data comprising a
> third data set and the modified first association, said third data being
> received from the television network, said third data corresponding to an
> updated version of the second data, said third data including the first
> association, and
> cause display of program information for television
> programs corresponding to television channels according to the
> associations of categories to television channels stored in the second
> portion of the memory.

Applicants submit that *Lasky* in view of *Yuen* fails to disclose, teach, or suggest at least "a terminal for displaying television program information and television programs, said terminal comprising an interface for receiving data from to the television network, said interface being capable of receiving a first data and a second data, said first data including respective program information for a plurality of corresponding television programs, said second data comprising respective *associations of one or more categories for a plurality of corresponding television channels*, said second data including a first association of a first category to a first television channel..." as recited in claim 63. More specifically, the Office Action asserts that *Yuen* discloses "receiving a user input corresponding to the assignment of the first category to a first television channel..." (p. 18, line 15).

Applicants respectfully disagree with this analysis. As illustrated in *Yuen*, column 5, beginning line 13, *Yuen* discloses that "[t]he first step in using the theme keys is to store selected channels under each theme key. These channels are stored in theme memory." As illustrated in this excerpt, *Yuen* appears to suggest that a *channel is assigned to a category*. Applicants submit that this is vastly different than "respective *associations of one or more categories for a plurality of corresponding television channels*," as recited in claim 63. For at least this reason, Applicants submit that claim 63 is allowable over *Lasky* in view of *Yuen*.

4.   Claims 54, 56, 58, 60, 62, 64, and 74 are Patentable Over *Lasky* in View of *Yuen*

In addition, dependent claim 54 is believed to be allowable for at least the reason that this claim depends from allowable independent claim 53. Dependent claim 56 is believed to be

allowable for at least the reason that this claim depends from allowable independent claim 55.

Dependent claim 58 is believed to be allowable for at least the reason that this claim depends

from allowable independent claim 57. Dependent claim 60 is believed to be allowable for at

least the reason that this claim depends from allowable independent claim 59. Dependent claim

62 is believed to be allowable for at least the reason that this claim depends from allowable

independent claim 61. Dependent claim 64 is believed to be allowable for at least the reason that

this claim depends from allowable independent claim 63. Dependent claim 74 is believed to be

allowable for at least the reason that this claim depends from allowable independent claim 73. *In*

re Fine, Minnesota Mining and Mfg.Co. v. Chemque, Inc., 303 F.3d 1294, 1299 (Fed. Cir. 2002).

C.   **Claims 69 and 72 are is Patentable Over *Lasky* in View of *Yuen*, Further in View of *Knee***

The Office Action indicates that claims 69 and 72 stand rejected under 35 U.S.C. 103(a)

as allegedly being unpatentable over *Lasky* in view of U.S. Patent Number 5,673,089 ("*Yuen*")

and U.S. Patent Number 6,014,184 ("*Knee*"). Applicants respectfully traverse this rejection for

at least the reason that *Lasky* in view of *Yuen* and *Knee* fails to disclose, teach, or suggest all of

the elements of claims 69 and 72. More specifically, dependent claims 69 and 72 are believed to

be allowable for at least the reason that these claims depend from allowable independent claim

65. *In re Fine, Minnesota Mining and Mfg.Co. v. Chemque, Inc.*, 303 F.3d 1294, 1299 (Fed. Cir.

2002).

D.   **Claim 78 is Patentable Over *Lasky* in View of *Amano*, Further in View of *Yuen***

The Office Action indicates that claim 78 stands rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over *Lasky* in view of U.S. Patent Number 5,673,089 ("*Yuen*") and U.S. Patent Number 6,014,184 ("*Knee*"). Applicants respectfully traverse this rejection for at least the reason that *Lasky* in view of *Yuen* and *Knee* fails to disclose, teach, or suggest all of the elements of claims 69 and 72. More specifically, dependent claim 78 is believed to be allowable for at least the reason that this claim depends from allowable independent claim 77. *In re Fine*, *Minnesota Mining and Mfg. Co. v. Chemque, Inc.*, 303 F.3d 1294, 1299 (Fed. Cir. 2002).

CONCLUSION

In light of the foregoing amendments and for at least the reasons set forth above, Applicants respectfully submit that all objections and/or rejections have been traversed, rendered moot, and/or accommodated, and that the now pending claims are in condition for allowance. Favorable reconsideration and allowance of the present application and all pending claims are hereby courteously requested.

Any other statements in the Office Action that are not explicitly addressed herein are not intended to be admitted. In addition, any and all findings of inherency are traversed as not having been shown to be necessarily present. Further, any and all findings of well-known art and official notice, or statements interpreted similarly, should not be considered well known since the Office Action does not include specific factual findings predicated on sound technical and scientific reasoning to support such conclusions.

If, in the opinion of the Examiner, a telephonic conference would expedite the examination of this matter, the Examiner is invited to call the undersigned attorney at (770) 933-9500.

Respectfully submitted,

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